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7 *Wal-Mart Stores, Inc.*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF NEVADA

10 MICHELLE ZAPINSKI, an individual;

Case No.: 2:17-cv-02176-APG-NJK

11 Plaintiff,

12 v.

13 WAL-MART STORES INC., a foreign
corporation d/b/a WAL-MART
14 SUPERCENTER #1584; DOES 1 through 10,
inclusive; ROE CORPORATIONS 11 through
20, inclusive; and ABC LIMITED LIABILITY
15 COMPANIES 21 through 30, inclusive,

STIPULATED PROTECTIVE ORDER
BETWEEN PLAINTIFF MICHELLE
ZAPINSKI AND DEFENDANT WAL-
MART STORES, INC.

16 Defendant.

17 **STIPULATED PROTECTIVE ORDER**

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19 The parties to this action, Defendant Wal-Mart Stores, Inc. and Plaintiff, Michelle Zapinski, by
20 their respective counsel, hereby stipulate and request that the Court enter a stipulated protective order
21 as follows:

22 1. The Protective Order shall be entered pursuant to the Federal Rules of Civil Procedure
23 and applicable local rules for the United States District Court, District of Nevada

24 2. The Protective Order shall govern all materials identified as "Confidential" by the
25 parties. Disclosed materials claimed to be confidential in nature shall be produced by placing the
26 following legend on the face of each document and each page so designated "CONFIDENTIAL" or
27 otherwise expressly identified as confidential. The parties will use best efforts to limit the number of
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1 documents designated as "Confidential." Confidential Information in this case shall include
2 Defendant's policies and procedures and training materials and maps/schematics of the subject
3 Walmart store.

4 3. Confidential Information shall be held in confidence by each party or his or her
5 representatives, attorneys, and agents for use solely for the purposes of this action and not for any
6 business purpose. Documents designated as confidential may not be disclosed to persons or parties
7 whose relationship to the dispute between the parties is not reasonably related to the prosecution or
8 defense of claims litigated.

10 4. Each counsel shall be responsible for providing notice of the Protective Order and the
11 terms therein to persons to whom they disclose "Confidential Information," as defined by the terms of
12 the Protective Order.

13 See order issued
concurrently herewith

~~The parties will file under seal any Confidential Information included in any papers,
leadings to avoid the public disclosure of said information.~~

16 6. The termination of this action shall not relieve the parties and persons obligated
17 hereunder from their responsibility to maintain the confidentiality of information designated
18 confidential pursuant to this Order.

19 7. After the final adjudication or resolution of this Lawsuit ("final adjudication" will
20 include the resolution of any appeals), a party may make a written demand to the other party for the
21 return of confidential materials, including all copies and reproductions thereof. The party receiving the
22 written demand shall have thirty (30) days from receipt of the written demand to comply with same.

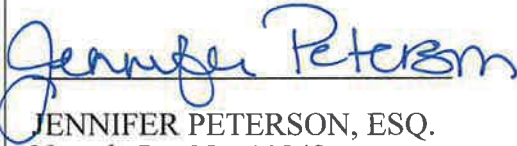
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1 8. Nothing in the Protective Order shall be deemed to preclude any party from seeking
2 and obtaining, on an appropriate showing, a modification of this Order.

3 9. DATED this 30th day of October, 2017.

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9 *Attorneys for Plaintiff*
10 *Michelle Zapinski*

/s/ Ryan Kerbow

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12 The terms of the above stipulation for a protective order by and between Defendant Wal-Mart
13 Stores, Inc. and Plaintiff Michelle Zapinski, by their respective counsel, shall hereby be the ORDER
14 of this Court.

15 DATED November 3, 2017

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18 UNITED STATES MAGISTRATE JUDGE